

## **EXHIBIT 1 TO ORDER**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BAYOU STEEL BD HOLDINGS, LLC, *et al.*,<sup>3</sup>

Debtors.

Chapter 7

Case No. 19-12153 (KBO)

(Jointly Administered)

GEORGE L. MILLER, in his capacity as Chapter 7  
Trustee of BAYOU STEEL BD HOLDINGS, L.L.C.,  
*et al.*,

Plaintiff,

vs.

CANADIAN NATIONAL RAILWAY COMPANY,

Defendant.

Adv. Proc. No. 21-50205 (KBO)

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**STIPULATION REGARDING APPOINTMENT OF MEDIATOR**

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Plaintiff, George L. Miller in his capacity as chapter 7 trustee of Bayou Steel BD Holdings, L.L.C., *et al.*, (the “Plaintiff”), for the estates of the above-captioned debtors (the “Debtors”) in the above-captioned cases pending under chapter 7 of title 11 of the United States Code (the “Bankruptcy Code”), by and through his undersigned counsel and defendant Canadian National Railway Company (the “Defendant,” and together with Plaintiff, the “Parties”), enter into this *Stipulation Regarding Appointment of Mediator* (the “Stipulation”) and hereby stipulate and agree as follows:

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<sup>3</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Bayou Steel BD Holdings, L.L.C., a Delaware limited liability company (1984), BD Bayou Steel Investment, LLC, a Delaware limited liability company (1222), and BD LaPlace, LLC, a Delaware limited liability company (5783).

1. Mark E. Felger shall be appointed as the mediator (the “Mediator”) in this adversary proceeding.

2. The mediation shall be conducted in accordance with the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware and/or otherwise as may be agreed by the Parties and the Mediator. The Parties will select a date for commencement of the mediation.

Dated: June 24, 2021

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

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